

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5

EPA Region 5 Records Ctr.



269281

**DATE:** January 11, 2005

**SUBJECT:** Comments on Draft RI Report for Chemical  
Recovery Systems, Elyria, Lorain County, Ohio,  
Cerclis No. OHD057001810, dated October 2004

**FROM:** Andrew Podowski, Toxicologist  
Remedial Response Section #5 *Andrew Podowski*

**TO:** Gwendolyn Massenburg, RPM

Section 6.1 par 2.

The 2 sentences: To insure the cumulative risk of  $10^{-6}$  and hazard level of 1, 10% of PRGs were ....

These 2 sentences should be changed to:

To insure the cumulative risk of  $10^{-6}$  cancer risk or less, and hazard index of 1 or less, PRGs were used for comparison. If the maximum concentration of a chemical detected at the site, for any specific media, exceeded or was equal to  $10^{-6}$  cancer risk, or exceeded or was equal to 0.1 hazard quotient, the chemical is considered a COC.

We have a regional memo for identifying and selecting COCs at Superfund sites. This memo was mentioned in my previous comments, dated November 22, 2002, for the RI/FS Work Plan. This memo should have been used for this purpose. It is unclear to me what is meant by 10% of PRGs were used for comparison.

Section 6.1 par 3.

The sentence: The anticipated future use of the site is to remain commercial and industrial.

If this is so, then a deed restriction is necessary for this site to make certain it will not be converted to residential use! This is so even if a remediation takes place based on industrial/commercial use. In order to avoid such a deed restriction, the remediation would have to take place based on residential use.

The sentence: The potential exposure pathways evaluated....

It should be changed to: The potential exposure pathways evaluated..., the inhalation of soil volatile chemicals to indoor and outdoor air, the inhalation of groundwater volatile chemicals to indoor and outdoor air, and ... contact.

This is so because soil does not volatilize and groundwater does not volatilize (although, ground water does evaporate).

Also, soil volatile chemicals to indoors were evaluated using a U.S.EPA 1996 model. More recent vapor intrusion modeling and guidance should be used for this purpose, namely, the EPA OSWER Draft Guidance for Evaluating the Vapor Intrusion to Indoor Air Pathway (November, 2002).

In the risk assessment summary, risk numbers are given for soil exposures only. Since ground water volatile chemicals and

dermal contact pathways were also evaluated, why are they excluded from the summary?

The sentence: Based on the risk assessment results, the contaminants ...

This sentence should be changed to: Based on the risk assessment results, the contaminants detected in soil pose a potential and unacceptable risk ...

#### Section 6.2 Environmental/Eco Evaluation

Although, it is true that the protection of human health is considered to be the primary concern at this site, nevertheless, the fact remains that transient animals such as migratory geese may spend considerable lengths of time, especially during spring and summer in urban areas with poor quality habitats, not to mention urbanized animals e.g., squirrels, plus domestic or stray animals such as cats and dogs. Often these animals may have even greater exposures to chemicals compared to humans simply because of their behavior, habits and greater potential contact with media such as soil and surface water. Therefore, potential risks to these animals cannot be dismissed. Indeed, any remediation of soils and/or water that occurs at this site, based on commercial/industrial human exposures, may still leave potential and unacceptable risk to these animal receptors.

I hope this information is useful to you. If you have any further questions, please call me at 6-7573.